## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

		§	
In re		§	Chapter 11 (Subchapter V)
FREE SPEECH SYSTEMS LLC,		§	
		§	Case No. 22-60043 (CML)
		§	
	Debtor.	§	

## SUBCHAPTER V TRUSTEE'S SUPPLEMENTAL STATEMENT

To Judge Christopher López, United States Bankruptcy Judge:

Melissa Haselden, (the "Subchapter V Trustee"), files this supplemental Statement, and represents as follows:

- 1. Since the filing of Trustee's Statement (Doc. No. 860), the Trustee continued to engage in extensive discussions with each party and professionals central to this case. At this juncture, Trustee reports the following:
  - Trustee supports entry of agreed order authorizing current FSS counsel to withdraw;
  - Trustee supports engagement of new counsel for FSS;
  - Trustee recommends that the Court set a show cause hearing as to why the case should not be converted to Chapter 7 not earlier than thirty (30) days from today's date; and
  - Trustee recommends that the Court immediately clarify CRO's role and authority so that the business can effectively operate pending further order of the Court.

DATED: March 11, 2024

/s/ Elizabeth C. Freeman

The Law Office of Liz Freeman Elizabeth C. Freeman (TX Bar No. 2400922) PO Box 61209 Houston, TX 77208-1209 Telephone: (832) 779-3580

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Proposed Counsel to Melissa Haselden,

Subchapter V Trustee

## **CERTIFICATE OF SERVICE**

I certify that on March 11,2024, a copy of this Motion was sent to the parties listed below by the Court's ECF notification system.

/s/ Elizabeth C. Freeman
Elizabeth C. Freeman